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ATTORNEYS AT LAW
TELECOMMUNICATIONS MANAGEMENT CONSULTANTS

ORIGINAL

2120 L Street, N.W., Suite 520
Washington, D.C. 20037

Telephone (202) 296-8890
Telecopier (202) 296-8893

RECEIVED

December 10, 2003

DEC 10 2003

Ms. Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Federal Communications Commission
Office of Secretary

Re: Petition for Clarification or, in the Alternative, Waiver, filed November 26, 2003
CC Docket No. 96-128

Dear Ms. Dortch:

On behalf of the noted companies participating in the above-captioned Petition, we are transmitting the original signed declarations for the following companies:

Adams Telephone Co-Operative
Brantley Telephone Company, Inc.
Chibardun Telephone Cooperative, Inc.
Cimarron Telephone Company
Duo County Telephone Cooperative
Grand River Mutual Telephone Corporation

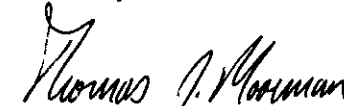
LaFourche Telephone Company LLC
Margaretville Telephone Company, Inc.
North Central Telephone Cooperative, Inc.
SEI Communications
Stayton Cooperative Telephone Co.
United Telephone Company

When either the Petition or supplement thereto was filed, the declarations bearing a facsimile signature were filed with the Commission as an attachment.

Please associate this attachment with the captioned Petition.

Should you have any questions, please contact this office.

Sincerely,



Thomas J. Moorman

Attachments

No. of Copies rec'd
List ABCDE

044

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

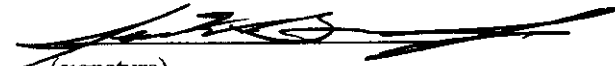
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When dial around calls and subscriber toll-free calls are made from payphones located in the Company's service area, we automatically route those calls from our central office to the toll provider (the Regional Bell Operating Company or other Interexchange Carrier) assigned the access code or the 8XX number being dialed. This automatic routing is triggered by the end user dialing a "1" and occurs even where the call is ultimately terminated to an end user located within our service area. Once routed to the toll provider, however, the toll provider controls the routing of the call and how that call will be terminated. Unlike the regional Bell Operating Company, our company is not an intraLATA toll provider.

Accordingly, when calls are made from any pay station in our service area, it is not possible for our company to handle a call that is compensable. Unlike the regional Bell Operating Companies or other local exchange carriers that provide intraLATA services on a compensable basis, our company provides only originating access service to other carriers. With respect to the traffic associated with the invoice received from APCC, we conclude that the compensable calls were handled by the intraLATA toll provider that is assigned to the paystation; no compensable calls were handled by our company.

I do hereby declare under penalties of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief, and that I am authorized by the Company indicated below to provide this Declaration.

Date. 11/25/03


(signature)

James W. Broecker Sr.
(printed name)

Manager
(Title)

Company Name: Adams Telephone Co. Cooperative

Company Address: PO Box 217

Golden, IL 62339

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

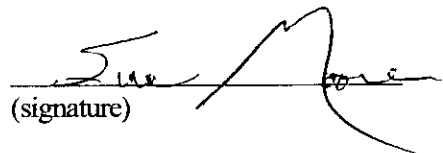
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I do hereby declare under penalties of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief, and that I am authorized by the Company indicated below to provide this Declaration.

Date: November 21, 2003


(signature)

Sue Moore
(printed name)

Office Manager
(Title)

Company Name: Brantley Telephone Company, Inc.

Company Address: P.O. Box 255

Nahunta, GA 31553

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

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I do hereby declare under penalties of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief, and that I am authorized by the Company indicated below to provide this Declaration.

Date 11-24-03

Ricky S. Vergin
(signature)

Ricky S. Vergin
(printed name)

CEO
(Title)

Company Name: Chibardun Telephone Cooperative, Inc.

Company Address: 110 N 2nd Ave
Dallas TX 75201

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY


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Date: 11.25.03


(signature)

GENE BALDWIN
(printed name)

GM
(Title)

Company Name: Cumtation Telephone Company

Company Address: P.O. Box 160

101 CUMTATION STREET

MANNFORD, DC 74044

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

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Date: 11/21/03

[Signature]
(signature)

Daryl L. Hammon
(printed name)

controller
(Title)

Company Name: Dur County Telephone

Company Address: PO box 8

Jameson, KY

40629

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

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Date. 11-24-03

Kenneth P. Roberts
(signature)

KENNETH P. ROBERTS
(printed name)

CONTROLLER
(Title)

Company Name: GRAND RIVER MUTUAL TELEPHONE CORP.

Company Address: 1001 KENTUCKY ST.

PRINCETON, MO 64673

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

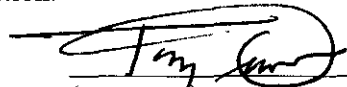
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I do hereby declare under penalties of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief, and that I am authorized by the Company indicated below to provide this Declaration.

Date. 12-05-03


(signature)

Tony Duet
(printed name)

President
(Title)

Company Name: LA Fourche Telephone Company LLC

Company Address P.O. Box 188
LAROSE
LOUISIANA 70373

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

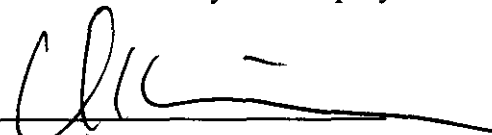
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Date 11/24/03


(signature)

Douglas Hinkley
(printed name)

Gen Mgr
(Title)

Company Name: Mangantville Telephone Co Inc

Company Address: Box 260

Mangantville NY 12455

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

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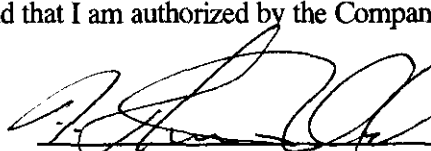
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Date

11/24/03



(signature)

F. Thomas Rowland
(printed name)

President + CEO
(Title)

Company Name:

North Central Telephone Coop. Inc.

Company Address:

872 E. Hwy. 52 Bypass
P.O. Box 70
Lafayette, TN 37083

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

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Date: 11-24-03

G. Ray Lawrence
(signature)

G. Ray Lawrence
(printed name)

OPERATION MGR.
(Title)

Company Name: SEI COMMUNICATIONS

Company Address: 14005 U.S. HIGHWAY 50E.
DILLSBORO IN 47018

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

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Date: 11/24/03

Don Lawrence
(signature)

DON LAWRENCE
(printed name)

PRESIDENT
(Title)

Company Name: STAYTON COOPERATIVE TELEPHONE CO.

Company Address: P.O. Box 477
STAYTON, OR 97383

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY


The undersigned company is a rural telephone company that received a letter dated March 10, 2003 together with an attached invoice from APCC Services, Inc. on behalf of various Payphone Service Providers ("PSPs") that referenced the Federal Communications Commission decision from October, 2002 addressing compensation obligations to PSPs.

When dial around calls and subscriber toll-free calls are made from payphones located in the Company's service area, we automatically route those calls from our central office to the toll provider (the Regional Bell Operating Company or other Interexchange Carrier) assigned the access code or the 8XX number being dialed. This automatic routing is triggered by the end user dialing a "1" and occurs even where the call is ultimately terminated to an end user located within our service area. Once routed to the toll provider, however, the toll provider controls the routing of the call and how that call will be terminated. Unlike the regional Bell Operating Company, our company is not an intraLATA toll provider.

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I do hereby declare under penalties of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief, and that I am authorized by the Company indicated below to provide this Declaration.

Date: 12/4/2003


(signature)

HERBERT R. BIVENS
(printed name)

GEN. MANAGER
(Title)

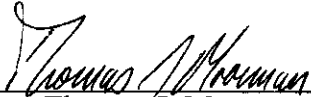
Company Name: UNITED TELEPHONE COMPANY

Company Address: P.O. BOX 38

CHAPEL HILL, TN 37034

CERTIFICATE OF SERVICE

I, Thomas J. Moorman, of Kraskin, Lesse & Cosson, LLC, 2120 L Street, NW, Suite 520, Washington, DC 20037, do hereby certify that a copy of the foregoing letter and attachments regarding the "Petition for Clarification or, in the Alternative, Waiver" was served on this 10th day of December 2003, to the following parties:


Thomas J. Moorman

William Maher, Chief
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
(Hand Delivered)

Qualex International
445 12th Street, SW
Room CY-B402
Washington, DC 20554
(Hand Delivered)

Robert F. Aldrich
Dickstein Shapiro Morin & Oshinsky, LLP
2101 L Street, N.W.
Washington, D.C. 20037-1526